

# **EXHIBIT A**

PHILADELPHIA  
ATLANTA  
CHARLOTTE  
CHERRY HILL  
CHICAGO  
DALLAS  
DENVER  
LAS VEGAS  
LONDON  
LOS ANGELES



NEW YORK  
NEWARK  
SAN DIEGO  
SAN FRANCISCO  
SEATTLE  
TRENTON  
WASHINGTON, DC  
WEST CONSHOHOCKEN  
WICHITA  
WILMINGTON

A PROFESSIONAL CORPORATION

1900 MARKET STREET PHILADELPHIA, PA 19103-3508 215.665.2000 800.523.2900 215.665.2013 FAX www.cozen.com

Sean P. Carter  
Direct Phone 215.665.2105  
Direct Fax 215.701.2105  
scarter@cozen.com

June 16, 2004

VIA FACSIMILE

Louis Cohen, Esquire  
Wilmer Cutler Pickering, LLP  
2445 M Street  
Washington, DC 20037

Re: Federal Insurance Co., et al. v. al Qaida, et al.  
Our File No.: 117430

Dear Mr. Cohen:

In accordance with the requirements of Rule 11, I am writing to respond to your request that the *Federal Insurance* plaintiffs withdraw certain allegations asserted against Prince Mohamed al-Faisal al-Saud in their Amended Complaint. In particular, you have requested that the *Federal Insurance* plaintiffs withdraw the allegation within Paragraph 473 of the Complaint that Prince Mohamed "chairs ... the al-Shamal Bank" of the Sudan, as well as the allegations of Paragraphs 475 and 476 of the Complaint relating to Prince Mohamed's alleged contributions to specified charitable organizations.

After further review, we have concluded that the allegation that Prince Mohamed chaired the al-Shamal Bank was based on inaccurate information. The inaccuracy arose from an error in the translation of a document referencing Prince Mohamed's position in Shamil Bank of Bahrain. Accordingly, we will be withdrawing the allegation that Prince Mohamed chaired the al-Shamal Bank of Sudan.

In addition, while the allegations of paragraphs 475 and 476 of the Complaint were based on information obtained through reasonable inquiry, we have decided that the underlying evidence lacks sufficient credibility to maintain these allegations at this time. Therefore, we agree to withdraw the allegations of those paragraphs as well, but reserve the right to reassert those claims should further discovery warrant.

Jun-16-04 01:01pm From-Cozen O'Connor

215-665-2013

T-227 P.003/003 F-169

Louis Cohen, Esquire

June 16, 2004

Page 2

At your earliest opportunity, please call me so that we may discuss the terms of the stipulation to effect the withdraw of the foregoing allegations.

I look forward to hearing from you in the immediate future.

Very truly yours,

COZEN O'CONNOR



BY: SEAN P. CARTER

SPC/bdw